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UNITED STATES OF AMERICA, ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS, ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA, ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PLANNED PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,

Defendants.

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

MAR 1 6 2021

CLERK, U.S. DISTRICT COURT

By

Deputy

Civil Action No. 2-21CV-022-Z

FILED IN CAMERA AND UNDER SEAL PURSUANT TO 31 U.S.C. § 3730(b)

DO NOT ENTER INTO PACER

RELATOR'S PROOF OF SERVICE

TO THE HONORABLE MATTHEW KACSMARYK:

Relator Alex Doe ("Relator") files the attached Affidavits of Service and Summonses pursuant to Rule 4 of the Federal Rules of Civil Procedure and Local Rule 4.1 of the Northern District of Texas.

Respectfully submitted.

/s/ Andrew B. Stephens
ANDREW B. STEPHENS
Texas Bar No. 24079396
andrew@hackerstephens.com

HEATHER GEBELIN HACKER Texas Bar No. 24103325 heather@hackerstephens.com

HACKER STEPHENS LLP* 108 Wild Basin Rd. South, Suite 250 Austin, Texas 78746 (512) 399-3022 (phone)

Attorneys for Relator Alex Doe

*Motion to proceed without local counsel pending

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon the following via U.S. mail:

United States of America c/o United States Attorney General Department of Justice 950 Pennsylvania Ave. NW Washington, D.C. 20530

Prerak Shah Acting United States Attorney, Northern District of Texas 1100 Commerce Street, Third Floor Dallas, TX 75242

Jeff Landry Attorney General of Louisiana Louisiana Department of Justice 1885 N. Third Street Baton Rouge, LA 70802

Ken Paxton Attorney General of Texas P.O. Box 12548 (MC 059) Austin, TX 78711-2548

/s/ Andrew B. Stephens
ANDREW B. STEPHENS

AFFIDAVIT OF SERVICE

State of Texas

County of Amarillo

United States District Court

Case Number: 2-21CV-022-Z

Plaintiff:

United States of America, The State of Texas, The State of Louisiana

VS

Defendant:

Planned Parenthood Federation of America, Inc., et al.

For:

Hacker Stephens LLP 108 Wild Basin Road South Suite 250 Austin, TX 78746

Received by Austin Process LLC on the 3rd day of March, 2021 at 12:28 pm to be served on United States of America c/o United States Attorney General, Department of Justice, 950 Pennsylvania Avenue, N.W., Washington, Washington County, DC 20530.

I, Mike Techow, being duly swom, depose and say that on the 8th day of March, 2021 at 4:53 am, I:

SERVICE BY CERTIFIED MAIL served by delivering a true copy of the Summons in a Civil Action, Complaint for Damages Under the Federal False Claims Act and State False Claims Acts with Exhibits A-C, Relator's Certificate of Interested Persons, Relator's Motion for Leave to Proceed without Local Counsel with the date of service endorsed thereon by me, to: F. H. United States Attorney General, Department of Justice at the address of: 950 Pennsylvania Avenue, N.W., Washington, Washington County, DC 20530, and informed said person of the contents therein, in compliance with state statutes.

Additional Information pertaining to this Service: 3/3/2021 Sent CMRRR # 7019 2970 0002 1380 7695

I certify that I am over the age of 18, of sound mind, have no interest in the above action. The facts stated in this affidavit are within my personal knowledge and are true and correct.

Subscribed and Sworn to before me on the 9th day of March, 2021 by the affiant who is personally

known to me.

NOTARY PUBLIC

Vinney

SUZI DICKERSON Notary Public, State of Texas Comm. Expires 04-04-2023 Notary ID: 131960911 Mike Techow PSC-1215, Exp. 7/31/2022

Austin Process LLC 809 Nueces Austin, TX 78701 (512) 480-8071

Our Job Serial Number: MST-2021001437 Ref: United States, et al v Planned Parenthood

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March 9, 2021

Dear Mike Techow:

The following is in response to your request for proof of delivery on your item with the tracking number: 7019 2970 0002 1380 7695.

Item Details

Status:

Delivered

Status Date / Time:

March 8, 2021, 4:53 am

Location:

WASHINGTON, DC 20530

Postal Product:

Priority Mail®

Extra Services:

Certified Mail™

Return Receipt Electronic
Up to \$50 insurance included

Shipment Details

Recipient Signature

Weight:

1lb, 0.0oz

Signature of Recipient:

EVALL HOVEVEN

Address of Recipient:

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely, United States Postal Service[®] 475 L'Enfant Plaza SW Washington, D.C. 20260-0004



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AUSTIN PROCESS, LLC 809 NUECES AUSTIN, TX 78701

UNITED STATES OF AMERICA, ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS, ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA, ex rel. ALEX DOE, Relator,

Plaintiffs.

_ ____,

v.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PLANNED PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,

Civil Action No. 2-21CV-022-Z

FILED IN CAMERA AND UNDER SEAL PURSUANT TO 31 U.S.C. § 3730(b)

DO NOT ENTER INTO PACER

SUMMONS IN A CIVIL ACTION

To: United States of America c/o United States Attorney General Department of Justice 950 Pennsylvania Avenue, N.W. Washington, D.C. 20530

Defendants.

Relator Alex Doe has filed a qui tam lawsuit on behalf of the United States of America, the State of Texas, and the State of Louisiana, against defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc.,

Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., for treble damages and civil penalties pursuant to the False Claims Act, 31 U.S.C. §§ 3729 et seq., the Texas Medicaid Fraud Prevention Act, Tex. Hum. Res. Code §§ 36.001 et seq., and the Louisiana Medical Assistance Programs Integrity Law, La. Rev. Stat. §§ 46:437.1 et seq.

A copy of the complaint is attached hereto and is served on the United States Government pursuant to 31 U.S.C. § 3730(b)(2) and Rule 4 of the Federal Rules of Civil Procedure.

Pursuant to 31 U.S.C. § 3730(b)(2) the complaint has been filed in camera and shall remain under seal for at least 60 days and shall not be served on the defendants until the court so orders.

Pursuant to 31 U.S.C. § 3730(b)(2)-(4), within 60 days after service of this summons and complaint on you, the government must either elect to intervene and proceed with the action, notify the court that the government declines to take over the action, or move the court for an extension of time during which the complaint remains under seal.

You must file your response with the court in camera and under seal and serve the relator's attorneys whose names and address are:

Andrew B. Stephens Heather G. Hacker Hacker Stephens LLP 108 Wild Basin Rd. South, Suite 250 Austin, Texas 78746

Date: March 2, 2021



CLERK OF COURT

/s/ D. Aguilera, Deputy Clerk

AFFIDAVIT OF SERVICE

State of Texas County of Amarillo United States District Court

Case Number: 2-21CV-022-Z

Plaintiff:

United States of America, The State of Texas, The State of Louisiana

VS

Defendant:

Planned Parenthood Federation of America, Inc., et al.

For: Hacker Stephens LLP 108 Wild Basin Road South Suite 250 Austin, TX 78746

Received by Austin Process LLC on the 3rd day of March, 2021 at 12:28 pm to be served on United States of America c/o Civil Process Clerk, United States Attorney's Office for the Northern District of Texas, 1100 Commerce Street, Third Floor, Dallas, Dallas County, TX 75242.

I, Mike Techow, being duly sworn, depose and say that on the 5th day of March, 2021 at 12:35 pm, I:

SERVICE BY CERTIFIED MAIL served by delivering a true copy of the Summons in a Civil Action, Complaint for Damages Under the Federal False Claims Act and State False Claims Acts with Exhibits A-C, Relator's Certificate of Interested Persons, Relator's Motion for Leave to Proceed without Local Counsel with the date of service endorsed thereon by me, to: A. N. United States Attorney's Office for the Northern District of Texas at the address of: 1100 Commerce Street, Third Floor, Dallas, Dallas County, TX 75242, and informed said person of the contents therein, in compliance with state statutes.

Additional Information pertaining to this Service: 3/3/2021 Sent CMRRR # 7019 2970 0002 1380 7688

I certify that I am over the age of 18, of sound mind, have no interest in the above action. The facts stated in this affidavit are within my personal knowledge and are true and correct.

Subscribed and Sworn to before me on the 9th day of March, 2021 by the affiant who is personally known to me.

NOTARY PUBLIC

SUZI DICKERSON Rectary Public, Stute or Texas Comm. Expires 04-04-2023 Mike Techow PSC-1215, Exp. 7/31/2022

Austin Process LLC 809 Nueces Austin, TX 78701 (512) 480-8071

Our Job Serial Number: MST-2021001435 Ref: United States, et al v Planned Parenthood

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March 5, 2021

Dear Mike Techow:

The following is in response to your request for proof of delivery on your item with the tracking number: 7019 2970 0002 1380 7688.

Item Details

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Delivered, Front Desk/Reception/Mail Room

Status Date / Time:

March 5, 2021, 12:35 pm

Location:

DALLAS, TX 75202

Postal Product:

Priority Mail®

Extra Services:

Certified Mail™

Return Receipt Electronic
Up to \$50 insurance included

Shipment Details

Weight:

1lb, 0.0oz

Recipient Signature

Signature of Recipient:

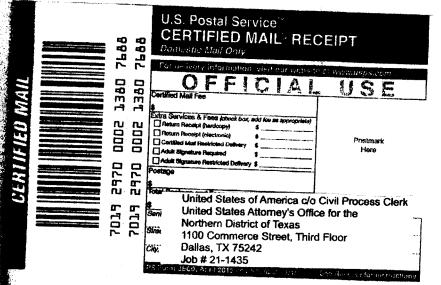
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Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely, United States Postal Service[®] 475 L'Enfant Plaza SW Washington, D.C. 20260-0004



AUSTIN PROCESS, LLC 809 NUECES AUSTIN, TX 78701

UNITED STATES OF AMERICA, ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS, ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA, ex rel. ALEX DOE, Relator,

Plaintiffs,

1 141114111

v.

INC..

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PLANNED PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,

Defendants.

Civil Action No. 2-21CV-022-Z

FILED IN CAMERA AND UNDER SEAL PURSUANT TO 31 U.S.C. § 3730(b)

DO NOT ENTER INTO PACER

SUMMONS IN A CIVIL ACTION

To: United States of America
c/o Civil Process Clerk
United States Attorney's Office for the Northern District of Texas
1100 Commerce Street, Third Floor
Dallas, Texas 75242

Relator Alex Doe has filed a *qui tam* lawsuit on behalf of the United States of America, the State of Texas, and the State of Louisiana, against defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc.,

Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., for treble damages and civil penalties pursuant to the False Claims Act, 31 U.S.C. §§ 3729 et seq., the Texas Medicaid Fraud Prevention Act, Tex. Hum. Res. Code §§ 36.001 et seq., and the Louisiana Medical Assistance Programs Integrity Law, La. Rev. Stat. §§ 46:437.1 et seq.

A copy of the complaint is attached hereto and is served on the United States Government pursuant to 31 U.S.C. § 3730(b)(2) and Rule 4 of the Federal Rules of Civil Procedure.

Pursuant to 31 U.S.C. § 3730(b)(2) the complaint has been filed in camera and shall remain under seal for at least 60 days and shall not be served on the defendants until the court so orders.

Pursuant to 31 U.S.C. § 3730(b)(2)-(4), within 60 days after service of this summons and complaint on you, the government must either elect to intervene and proceed with the action, notify the court that the government declines to take over the action, or move the court for an extension of time during which the complaint remains under seal.

You must file your response with the court in camera and under seal and serve the relator's attorneys whose names and address are:

Andrew B. Stephens Heather G. Hacker Hacker Stephens LLP 108 Wild Basin Rd. South, Suite 250 Austin, Texas 78746

Date: March 2, 2021



CLERK OF COURT

/s/ D. Aguilera, Deputy Clerk

AFFIDAVIT OF SERVICE

State of Texas County of Amarillo United States District Court

Case Number: 2-21CV-022-Z

Plaintiff:

United States of America, The State of Texas, The State of Louisiana

VS

Defendant:

Planned Parenthood Federation of America, Inc., et al.

For:

Hacker Stephens LLP 108 Wild Basin Road South Suite 250 Austin, TX 78746

Received by Austin Process LLC on the 3rd day of March, 2021 at 12:28 pm to be served on State of Texas c.o Attorney General of Texas Ken Paxton, Office of the Attorney General of Texas, 209 W. 14th, Austin, Travis County, TX 78701.

I, Lucas McGill, being duly sworn, depose and say that on the 5th day of March, 2021 at 9:39 am, I:

served a GOVERNMENT AGENCY by delivering a true copy of the Summons in a Civil Action, Complaint for Damages Under the Federal False Claims Act and State False Claims Acts with Exhibits A-C, Relator's Certificate of Interested Persons, Relator's Motion for Leave to Proceed without Local Counsel with the date and hour of service endorsed thereon by me, to: Jordan Eskew, Office of the Attorney General of Texas as Authorized Agent at the address of 209 W. 14th, Austin, Travis County, TX 78701 and informed said person of the contents therein, in compliance with State Statutes.

I certify that I am over the age of 18, of sound mind, have no interest in the above action. The facts stated in this affidavit are within my personal knowledge and are true and correct.

Subscribed and Sworn to before me on the 5th day of March, 2021 by the affiant who is personally

known to me.

MARIE NICOLE HENRY Notary Public, State of Tex

Comm. Expires 04-04-202

Notary ID 131960939

Lucas McGill PSC-16408, Exp. 2/28/2021

Austin Process LLC 809 Nueces Austin, TX 78701 (512) 480-8071

Our Job Serial Number: MST-2021001430 Ref: United States, et al v Planned Parenthood

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UNITED STATES OF AMERICA, ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS, ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA, ex rel. ALEX DOE, Relator,

Plaintiffs.

1 laments

V.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PLANNED PARENTHOOD SOUTH
TEXAS, INC., PLANNED
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COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,

Defendants.

Civil Action No. 2-21CV-022-Z

FILED IN CAMERA AND UNDER SEAL PURSUANT TO 31 U.S.C. § 3730(b)

DO NOT ENTER INTO PACER

SUMMONS IN A CIVIL ACTION

To: State of Texas
c/o Attorney General of Texas Ken Paxton
Office of the Attorney General of Texas
209 West 14th St.
Austin, Texas 78701

Relator Alex Doe has filed a qui tam lawsuit on behalf of the United States of America, the State of Texas, and the State of Louisiana, against defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc.,

Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., for treble damages and civil penalties pursuant to the False Claims Act, 31 U.S.C. §§ 3729 et seq., the Texas Medicaid Fraud Prevention Act, Tex. Hum. Res. Code §§ 36.001 et seq., and the Louisiana Medical Assistance Programs Integrity Law, La. Rev. Stat. §§ 46:437.1 et seq.

A copy of the complaint is attached hereto and is served on the State of Texas pursuant to 31 U.S.C. § 3732(c), Rule 4 of the Federal Rules of Civil Procedure, and Texas Human Resources Code § 36.102.

Pursuant to 31 U.S.C. § 3730(b)(2) the complaint has been filed in camera and shall remain under seal for at least 60 days and shall not be served on the defendants until the court so orders.

Pursuant to 31 U.S.C. § 3730(b)(2)-(4), within 60 days after service of this summons and complaint on you, the government must either elect to intervene and proceed with the action, notify the court that the government declines to take over the action, or move the court for an extension of time during which the complaint remains under seal.

You must file your response with the court in camera and under seal and serve the relator's attorneys whose names and address are:

Andrew B. Stephens Heather G. Hacker Hacker Stephens LLP 108 Wild Basin Rd. South, Suite 250 Austin, Texas 78746

Date: March 2, 2021



CLERK OF COURT

/s/ D. Aguilera, Deputy Clerk

RETURN OF SERVICE

UNITED STATES DISTRICT COURT Amarillo District of Texas

Case Number: 2-21CV-022-Z United States of America, The State of Texas, The State of Louisiana VS. Defendant: Planned Parenthood Federation of America, Inc., et al. For: Hacker Stephens LLP Received by Austin Process LLC on the 3rd day of March, 2021 at 12:28 pm to be served on State of Louisiana c.o Attorney interested Persons, Relator's Motion for Leave to Proceed without Local Counsel in accordance with state statutes in the manner marked below: agency at 1885 North Third St. Beton Roux, L1 70802 COMMENTS: I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made. My name is Tom Cassisa date of birth is 3724/1162 and my PROCESS SERVER # address is 5816 5. Share Dr. Beton Rouge & Arasi 7 6. Beton Kone Parish, LA (County). Appointed in accordance with State Statutes I declare under penalty of perjury that the above is **Austin Process LLC** 809 Nueces true and correct. Executed in, **Austin, TX 78701** Elehalore Parish _ County State of Louisiana, on the 8th day of Merch , 2021. (512) 480-8071 Our Job Serial Number: 2021001432 Tom Cassisa, Process Servi-Ref: United States, et al v Planned Parenthood

8888888

UNITED STATES OF AMERICA, ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS, ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA, ex rel. ALEX DOE, Relator,

Plaintiffs.

v.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PLANNED PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,

Defendants.

Civil Action No. 2-21CV-022-Z

FILED IN CAMERA AND UNDER SEAL PURSUANT TO 31 U.S.C. § 3730(b)

DO NOT ENTER INTO PACER

SUMMONS IN A CIVIL ACTION

999999999

To: State of Louisiana c/o Attorney General of Louisiana Jeff Landry Office of the Attorney General of Louisiana 1885 North Third Street Baton Rouge, Louisiana 78702

Relator Alex Doe has filed a qui tam lawsuit on behalf of the United States of America, the State of Texas, and the State of Louisiana, against defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc.,

Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., for treble damages and civil penalties pursuant to the False Claims Act, 31 U.S.C. §§ 3729 et seq., the Texas Medicaid Fraud Prevention Act, Tex. Hum. Res. Code §§ 36.001 et seq., and the Louisiana Medical Assistance Programs Integrity Law, La. Rev. Stat. §§ 46:437.1 et seq.

A copy of the complaint is attached hereto and served on the State of Louisiana pursuant to 31 U.S.C. § 3732(c), Rule 4 of the Federal Rules of Civil Procedure, and Louisiana Revised Statutes § 46.439.2(A).

Pursuant to 31 U.S.C. § 3730(b)(2) the complaint has been filed in camera and shall remain under seal for at least 60 days and shall not be served on the defendants until the court so orders.

Pursuant to 31 U.S.C. § 3730(b)(2)-(4), within 60 days after service of this summons and complaint on you, the government must either elect to intervene and proceed with the action, notify the court that the government declines to take over the action, or move the court for an extension of time during which the complaint remains under seal.

You must file your response with the court in camera and under seal and serve the relator's attorneys whose names and address are:

Andrew B. Stephens Heather G. Hacker Hacker Stephens LLP 108 Wild Basin Rd. South, Suite 250 Austin, Texas 78746

Date: March 2, 2021



CLERK OF COURT

/s/ D. Aguilera, Deputy Clerk

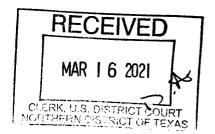
HACKERSTEPHENS

ANDREW B. STEPHENS
Partner

O (512) 399-3022 M (512) 569-0543 Andrew@HackerStephens.com

March 15, 2021

United States District Clerk United States District Court 205 SE 5th Avenue, Room 133 Amarillo, Texas 79101



Via UPS

Re: [SEALED] United States of America ex rel. Alex Doe, Relator, et al. v. Planned Parenthood Federation of America, Inc., et al.; Civil Action No. 2-21CV-022-Z; United States District Court for the Northern District of Texas, Amarillo Division

Dear District Clerk:

Please file in camera and under seal the enclosed (i) Proof of Service, (ii) Notice of Identity, and (ii) Motion for a Protective Order in the above-referenced case. Pursuant to Local Rule 5.1(b) a judge's copy of the Motion and proposed order are also enclosed.

The proposed order in Word format will be emailed to Kacsmaryk_Orders@txnd.uscourts.gov as required by Local Rule 7.1 and Judge Kacsmaryk's specific requirements for submission of proposed orders.

Kindly return a file stamped copy of the documents to my email listed above at your earliest convenience. Please contact me if you have any questions or need additional information.

Thank you very much for your assistance.

Sincerely,

Andrew B. Stephens

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UNITED STATES DISTRICT COURT 205 SE 5TH AVE RM 133 AMARILLO TX 79101

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